

LEWIS BRISBOIS BISGAARD & SMITH LLP

JON KARDASSAKIS

E-Mail: Jon.Kardassakis@lewisbrisbois.com

633 West 5th St., Suite 4000

Los Angeles, California 90071

Telephone: 213.250.1800

Facsimile: 213.250.7900

Attorneys for Defendant

CEDARS-SINAI MEDICAL CENTER

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ANTHONY RANDALL,

Plaintiff,

vs.

UNITED NETWORK FOR ORGAN
SHARING; CEDARS-SINAI
MEDICAL CENTER,

Defendants.

Case No. 2:23-cv-02576 MEMF

Hon. Maame Ewusi-Mensah Frimpong

**NOTICE OF ERRATA RE
CORRECTION TO CITATION IN
CEDARS-SINAI'S MOTION IN
LIMINE NO. 1**

Date: September 27, 2025

Time: 9:00 a.m.

Crtrm.: 8B

FSC Date: 09/27/2025

Trial Date: 10/06/2025

TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR
RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 20, 2025, defendant Cedars-Sinai Medical Center ("Cedars") filed with the court its Notice of Motion and Motion *in Limine* No. 1 to Exclude Opinion Testimony of Herbert Y. Lin at Trial. [DKT 162, "Motion"]. Plaintiff Anthony Randall's opposition to same [DKT 205], dated September 3, 2025, identified a typographical and/or clerical error in one of the Motion's case citations. As submitted, the relevant cite with quotation reads: "*See id.* (rejecting amendment, finding "the new theories of liability have been within Plaintiffs' knowledge from the inception of this action")." [DKT. 162 at page 5, lines

1 5-6]. The corrected citation reads: “*See Mejia v. Ill. Tool Works Inc.*, 2019 US. Dist.
2 LEXIS 228668, *22 (C.D. Cal. Dec. 12, 2019) (rejecting amendment, finding “the
3 new theories of liability have been within Plaintiffs’ knowledge from the inception of
4 this action”).” The citation error occurred when drafting the Motion; while the quoted
5 text is accurate, the proper citation was inadvertently omitted.

6 Cedars hereby submits the corrected Motion, attached as Exhibit 1.
7

8 DATED: September 12, 2025 LEWIS BRISBOIS BISGAARD & SMITH LLP
9

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11 By: /s/ Jon Kardassakis
12 Jon Kardassakis
13 Attorneys for Defendant,
14 CEDARS-SINAI MEDICAL CENTER
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EXHIBIT 1

1 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

2 JON KARDASSAKIS

3 E-Mail: Jon.Kardassakis@lewisbrisbois.com

4 633 West 5th St., Suite 4000

5 Los Angeles, California 90071

6 Telephone: 213.250.1800

7 Facsimile: 213.250.7900

8 Attorneys for Defendant

9 CEDARS-SINAI MEDICAL CENTER

10 UNITED STATES DISTRICT COURT

11 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

12 ANTHONY RANDALL,

13 Plaintiff,

14 vs.

15 UNITED NETWORK FOR ORGAN
SHARING; CEDARS-SINAI
MEDICAL CENTER,

16 Defendants.

Case No. 2:23-cv-02576 MEMF

Hon. Maame Ewusi-Mensah Frimpong

**CEDARS-SINAI MEDICAL
CENTER'S NOTICE OF MOTION
AND MOTION *IN LIMINE* NO. 1
TO EXCLUDE OPINION
TESTIMONY OF HERBERT Y. LIN
AT TRIAL; MEMO OF POINTS
AND AUTHORITIES;
DECLARATION OF JON
KARDASSAKIS**

FSC Date: 09/27/2025

Trial Date: 10/06/2025

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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on September 27, 2025,¹ or as soon thereafter
3 as the matter may be heard in the above-referenced court located at United States
4 Courthouse 8B, 350 West First Street, Los Angeles, California, defendant Cedars-
5 Sinai Medical Center will and hereby does move *in limine* as follows:

6 **Motion in Limine No. 1:** To preclude the following testimony of Herbert Y.
7 Lin at trial: (1) Cedars-Sinai's kidney transplant selection policy could and did cause
8 treating nephrologists to delay referral of patients, including Anthony Randall, to
9 Cedars-Sinai for waitlisting until patient calculated eGFR was 20 or below (*see*
10 Decl. of Dr. Herbert Y. Lin in Support of Plaintiff's Reply in Support of Motion for
11 Class Certification (March 17, 2025)) ¶¶ 32, 35, 39; *see also* Rebuttal Report of Dr.
12 Herbert Y. Lin (March 28, 2025)) ¶¶ 18, 40, 43, 47); and (2) Cedars knowingly used
13 a race-adjusted eGFR score when Plaintiff was referred by Kaiser with completed
14 test results (*see, e.g.*, Lin Decl. ¶ 38; Lin Rebuttal ¶¶ 41, 46).

15 This motion *in limine* is based on this Notice of Motion and Accompanying
16 Memorandum of Points and Authorities, the Declaration of Jon Kardassakis, the
17 records and files of the Court, and any other matter of which this Court may take
18 judicial notice.

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26 _____
27 ¹ The Court ordered motions *in limine* to be heard at the Final Pre-Trial
28 Conference. That conference is set for September 27; the start time has yet to be
set. *See* Dkt. 96.

Certification of Compliance

Pursuant to L.R. 7-3, the parties conferred regarding the issues raised in this Motion on August 13, 2025. Declaration of Jon Kardassakis ¶ 2.

DATED: August 20, 2025 LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Jon Kardassakis
Jon Kardassakis
Attorneys for Defendant,
CEDARS-SINAI MEDICAL CENTER

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION AND BACKGROUND**

3 Anthony Randall (“Plaintiff”) was a Kaiser patient who received treatment for
4 his kidney function from a Kaiser nephrologist. To be eligible to start accruing wait
5 time on the national kidney transplant list, an individual needs to be accepted by a
6 transplant center as a qualifying transplant patient and either have commenced
7 dialysis or have a kidney function test score of 20 or below. In May 2017, Plaintiff
8 had a blood test at Kaiser that reported an eGFR score of 21. In January and
9 February 2018, he had additional blood tests at Kaiser that reported a kidney
10 function score of 18. In June 2018, Kaiser referred Plaintiff to Cedars-Sinai
11 Medical Center (“Cedars”) for kidney transplant evaluation. One of Plaintiff’s
12 experts, Dr. Herbert Y. Lin (“Lin”), a clinical nephrologist, seeks to opine that
13 Kaiser did not refer Plaintiff to Cedars for evaluation until his kidney function score
14 dropped below 20 because “Cedars-Sinai ... policy could cause treating
15 nephrologists to delay referral ... until [a patient’s] calculated eGFR was 20 or
16 below.” Rebuttal Report of Dr. Herbert Y. Lin (March 28, 2025) ¶ 40. Lin also
17 seeks to opine that Cedars’ policy “caused Plaintiff’s referral to be delayed” *Id.*
18 ¶ 47; *see also id.* ¶ 18; *id.* ¶ 40 (“Cedars-Sinai’s own poli[cy] delayed Plaintiff’s
19 referral”); Decl. of Dr. Herbert Y. Lin in Support of Plaintiff’s Reply in Support
20 of Motion for Class Certification (March 17, 2025) ¶¶ 32, 35, 39. These opinions
21 should be excluded because Lin offers this **new theory, which is not alleged in the**
22 **Second Amended Complaint**. Additionally, Lin lacks expertise on the subject. He
23 has no experience with Kaiser and did not investigate or acquire any information
24 about Kaiser’s practices, including what determines when Kaiser will refer patients
25 for transplant evaluation. Lin doesn’t even know whether Kaiser was familiar with
26 Cedars’ transplant selection policy. He assumes Kaiser knew Cedars’ policy (with
27 no basis for that assumption) and speculates that such knowledge delayed referral.
28 Lin’s speculation and assumptions are not a sufficient basis for his Kaiser opinions.

1 **II. DISCUSSION**

2 **A. Authority of Court to Limit Admission of Evidence**

3 "A motion *in limine* is a procedural mechanism to limit in advance testimony
4 or evidence in a particular area." *United States v. Heller*, 551 F.3d 1108, 1111 (9th
5 Cir. 2009). "A party may use a motion *in limine* to exclude inadmissible or
6 prejudicial evidence before it is actually introduced at trial." *Johnson v. Nat. Gas*
7 *Fuel Sys., Inc.*, 2024 U.S. Dist. LEXIS 222669, *5 (E.D. Cal. Dec. 9, 2024) (citing
8 *Luce v. United States*, 469 U.S. 38, 40 n.2 (1984)). A motion *in limine* "allows the
9 parties to resolve evidentiary disputes before trial and avoids potentially prejudicial
10 evidence being presented in front of the jury, thereby relieving the trial judge from
11 the formidable task of neutralizing the taint of prejudicial evidence." *Id.* (citing
12 *Brodit v. Cambra*, 350 F.3d 985, 1004-05 (9th Cir. 2003)). A court may limit the
13 admissibility of evidence based on its "inherent authority to manage the course of
14 trials." *Zaragoza v. Cnty. of Riverside*, 2024 U.S. Dist. LEXIS 33708, *2-4 (C.D.
15 Cal. Jan. 18, 2024) (quoting *Luce*, 469 U.S. at 41 n.4).

16 **B. Lin's Conjecture That Cedars-Sinai's Transplant Policy Caused A**
17 **Delay In The Referral of Patients, Including Plaintiff, For**
18 **Waitlisting Until Calculated eGFR Was 20 Or Below Is**
19 **Inadmissible.**

20 Lin's testimony is not admissible under Fed. R. Evid. 702 because the theory
21 of liability Lin articulates (i.e., Cedars' policy delayed plaintiff's referral) is not pled
22 in the operative Second Amended Complaint. Plaintiff, through Lin, asserted this
23 theory of liability **after** the close of fact discovery and with no Kaiser witnesses
24 having been deposed by any party. Fact discovery closed on January 9, 2024.
25 Kardassakis Decl. ¶ 11. Lin asserted this new theory, in March 2025, two months
26 after fact discovery closed. *See* Lin Decl. (March 17, 2025) ¶¶ 32, 35, 39; Lin
27 Rebuttal Rpt. (March 28, 2025) ¶¶ 18, 40, 43, 47. "Federal Rule of Civil Procedure
28 8(a)(2) requires that the allegations in the complaint 'give the defendant fair notice

1 of what the plaintiff's claim is and the grounds upon which it rests.” *Zaragoza*, at
2 *16 (quoting *Pickern v. Pier 1 Imps. (U.S.), Inc.*, 457 F.3d 963, 968 (9th Cir. 2006)).
3 Plaintiff did not provide Cedars notice of Plaintiff’s “Kaiser delayed because of
4 Cedars” theory and no good cause exists to allow amendment of the operative
5 complaint now. *See Mejia v. Ill. Tool Works Inc.*, 2019 US. Dist. LEXIS 228668,
6 *22 (C.D. Cal. Dec. 12, 2019) (rejecting amendment, finding “the new theories of
7 liability have been within Plaintiffs’ knowledge from the inception of this action”).

8 Lin’s testimony also should be barred because it is inadmissible under Fed. R.
9 Evid. 702. Plaintiff offers Lin as an expert witness. “Federal Rule of Evidence
10 702 governs the admissibility of expert witness testimony. The admissibility of
11 expert testimony is comprised of three general inquiries: Is the witness qualified to
12 testify about the subject matter? Is the testimony relevant? And is the testimony
13 reliable?” *Zaragoza*, at *4 (citing Fed. R. Evid. 702). Lin is neither qualified to
14 testify on the subject matter nor is his testimony reliable.

15 An individual can be qualified to testify as an expert if they have sufficient
16 “knowledge, skill, experience, training, or education” about the subject matter of the
17 testimony. Fed. R. Evid. 702. The subject matter here is Kaiser’s practices for
18 referring patients for kidney transplant evaluations. Lin admitted in deposition and
19 written submissions that he knows nothing about Kaiser’s referral practices: he has
20 never worked for Kaiser, he did not review any Kaiser policies, he is not aware of
21 any Kaiser contracts concerning Kaiser referrals, he did not interview Kaiser
22 nephrologists, he did not identify any documents addressing Kaiser’s practices, he
23 does not know what Kaiser’s referral policies state or how they are interpreted and
24 implemented by Kaiser personnel, and he is not aware of whether Kaiser referring
25 physicians rely on Cedars’ policies in making referral decisions. Deposition of Dr.
26 Herbert Y. Lin (April 11, 2025) at 55:3-56:9, 61:3-25, 65:18-66:11, 168:4-19,
27 176:21-24, 181:1-18); Lin Rebuttal Rpt. ¶ 17; Lin Report ¶¶ 2-4, 13. In fact, Lin
28 admitted he does not know the kidney transplant selection policies of his own

1 hospital or other medical centers, and he makes referral decisions without
2 considering his own or any other hospital's policies. Lin Depo. at 145:23-155:15.
3 He is not an expert on why Kaiser does or does not refer kidney disease patients for
4 possible transplant or what affects Kaiser's decisions.

5 Nor is Lin's testimony on the subject matter reliable. He is not providing
6 scientific testimony but rather an opinion not grounded in facts. When testimony is
7 non-scientific, its admissibility is premised on the "knowledge and experience of the
8 expert" in the subject matter. *Zaragoza*, at *6 (citation omitted). Lin has no
9 experience with or knowledge of Kaiser's transplant referral practices, including
10 Kaiser's referral interactions with Cedars. Lin doesn't even understand Cedars'
11 selection policy.² His purported expert "opinions" on Kaiser's decision-making as it
12 relates to Cedars must be excluded.

13 **C. Lin's Conjecture That Cedars-Sinai Knew The Test Method Kaiser**
14 **Used At The Time Cedars Registered Plaintiff On The Kidney**
15 **Transplant Waitlist Is Inadmissible Under Fed. R. Evid. 702**

16 Federal Rule of Evidence 702 allows a qualified expert to testify "in the form
17 of an opinion or otherwise" where:

- 18 (a) the expert's scientific, technical, or other specialized knowledge
19 will help the trier of fact to understand the evidence or to
20 determine a fact in issue;
21 (b) the testimony is based on sufficient facts or data;
22 (c) the testimony is the product of reliable principles and methods;
23 and
24 (d) the expert has reliably applied the principles and methods to the
25 facts of the case.

25 ² Lin is unsure of the Cedars policy in effect during the relevant period. He mistakenly
26 focuses on Cedars' 04/29/2019 policy, which became effective months **after** Cedars
27 registered Randall for the kidney transplant waitlist. *See* Kim Decl. (March 28, 2025)
28 Ex. 1 ¶ 15. Lin also misconstrues when Cedars will accept patients for evaluation for
kidney transplant pre-emptive listing. *Id.* ¶¶ 17-18.

1 Fed. R. Evid. 702. Expert testimony is admissible under Rule 702 “if it is both
2 relevant and reliable.” *Cooper v. Brown*, 510 F.3d 870, 942 (9th Cir. 2007).
3 “[R]elevance means that the evidence will assist the trier of fact to understand or
4 determine a fact in issue.” *Id.* Under the reliability requirement, expert testimony
5 must “relate to scientific, technical, or other specialized knowledge, which does not
6 include unsubstantiated speculation and subjective beliefs.” *Id.*

7 “Importantly, there must be a recognized body of knowledge, learning, or
8 expertise upon which the witness relies. Where there is no field of expertise,
9 nobody will qualify as an expert witness on the subject.” *Perez v. Seafood Peddler*
10 *of San Rafael, Inc.*, 2014 WL 2810144, *2 (N.D. Cal. June 20, 2014) (internal
11 quotation marks omitted). The burden is on the proponent of the expert testimony to
12 show, by a preponderance of the evidence, that the admissibility requirements are
13 satisfied. *See id.* at *4.

14 Lin’s testimony that Cedars knew Kaiser used the race-based coefficient to
15 calculate Plaintiff’s eGFR score when Cedars registered Plaintiff on the transplant
16 waitlist should be excluded. First, this is not a proper subject for expert opinion. It
17 is a fact issue that should be adjudicated based on actual evidence. In his Rebuttal
18 Report, Lin opines, “When Cedars-Sinai did place Mr. Randall on the waitlist, it
19 used a race-adjusted eGFR score, i.e., the medical records indicate that Mr. Randall
20 was registered using his September 25, 2018, lab score, and that this lab score was
21 multiplied by 1.16 (the race-based coefficient used in the 2009 CKD-EPI equation)
22 because Mr. Randall is Black. This is consistent with all of Randall’s lab scores
23 while at Cedars-Sinai and the testimony of Dr. Irene Kim (“Kim”) that Cedars-Sinai
24 used the race-based coefficient.” Lin Rebuttal Rpt. ¶ 41. Lin speculates that Cedars
25 knew or should have known about Kaiser’s use of the race-based coefficient because
26 “Cedars-Sinai policy requires that Cedars-Sinai may only register patients using
27 certain tests to estimate GFR, including the race-based MDRD test.” *Id.* ¶ 43 (citing
28 to Kim testimony that Cedars policy provided, “For patients not yet on chronic

1 dialysis, GFR is determined by calculation of the creatinine clearance, MDRD
2 formula, Cockcroft-Gaul formula, or by determination of a nuclear GFR scan.”).
3 Lin argues, “If Cedars-Sinai did not know how the test was calculated, Cedars-
4 Sinai’s Kidney Transplant Selection Policy would not allow it to use the February
5 2018 score to register Plaintiff. This is consistent with Cedars-Sinai not relying on
6 the February 2018 test, instead registering Plaintiff using a race-based test from
7 September 2018, entering the race-adjusted value into UNet.” *Id.* ¶ 46. Lin’s
8 opinion is inadmissible because he lacks knowledge and has no expertise to opine
9 on this subject matter.

10 Lin conflates Cedars’ policy on assessing potential kidney transplant patients
11 with Cedars’ practice in adding patients to the UNet kidney transplant wait list.
12 Cedars’ Kidney Transplant Selection Policy provides that Cedars’ Patient Selection
13 Committee determines the suitability of candidates for kidney transplantation. *See*
14 Dkt. 104-50 (policy effective 05/29/2018). The policy states, “For patients not yet
15 on chronic dialysis, GFR is determined by calculation of the creatinine clearance,
16 MDRD formula, Cockcroft-Gault formula, or by determination of a nuclear GFR
17 scan.” *Id.* at p. 3 of 6. While any of these four methods are expressly accepted,
18 only one (the MDRD formula) involves a race factor. As to Cedars practice in
19 registering patients on the transplant list, the evidence is the following: “When
20 presented with a GFR score of 20 or below from a referring physician as Kaiser
21 provided for Mr. Randall, it was not Cedars-Sinai’s practice in 2018 or January
22 2019 to investigate what method the referring physician used to determine that
23 score. ... The UNet registration at that time did not call for information regarding
24 the method used to determine the GFR score. No further inquiry regarding what
25 method the referring physician used was required.” Declaration of Margaret Farrell
26 (Apr. 22, 2025) ¶ 5. Lin ignores these facts and seeks to opine that Cedars somehow
27 knew the method used to determine GFR score. But, Lin is not an expert on Cedars’
28 practices or what Cedars knew at the time. He simply seeks to opine that he does

1 not believe Farrell.

2 Similar to Farrell, Kim, director of the Comprehensive Transplant Center at
3 Cedars,³ offers a declaration that Cedars *did not know* what test method Kaiser used
4 to generate Plaintiff's eGFR score. *See, e.g.*, Kim Decl. (Feb. 11, 2025) Ex. 1 ¶ 5.

5 Lin's opinion is also internally inconsistent. He reviews Kaiser lab reports
6 (that Cedars did not have in 2018 or 2019) and reads Kaiser's report to state that
7 Kaiser multiplied Plaintiff's September 2018 lab score by 1.16 (the race-based
8 coefficient used in the 2009 CKD-EPI equation). Lin Decl. ¶ 33; Lin Rebuttal Rpt.
9 ¶ 41. Lin asserts Cedars must have known what method Kaiser used to determine
10 GFR because Cedars' selection policy identifies only four acceptable methods for
11 GFR determinations (i.e., Cedars would have checked to confirm compliance with
12 policy). Lin Decl. ¶ 38. Lin contends Cedars used a score Kaiser generated using
13 the CKD-EPI equation, which was **not** one of the four accepted methods. *Id.* But if
14 Cedars had investigated what method Kaiser used and had learned it was the CKD-
15 EPI equation, and if Cedars strictly adhered to the policy of only accepting the four
16 listed methods, Cedars would not have registered Plaintiff because the CKD-EPI
17 method is not one of the accepted methods. This directly contradicts Lin's
18 conjecture that Cedars must have checked the September 2018 test used to calculate
19 Plaintiff's eGFR score. *Cooper*, 510 F.3d at 942. Lin's testimony is based on
20 "unsubstantiated speculation and subjective beliefs" and should not be allowed. *Id.*

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25 ³ Kim is a board-certified general surgeon and certified by the American Society of
26 Transplant Surgeons as a multiorgan transplant surgeon. She is a Professor of Surgery
27 and the Mark and Esther Schulman Endowed Chair in Transplant Medicine at Cedars.
28 She serves as Cedars' Surgical Director, Liver Transplant program. Kim Decl. (Feb.
11, 2025) Ex. 1 § II.

1 ///

2 **III. CONCLUSION**

3 For the reasons herein, Defendant requests the Court grant its Motion in *Limine*
4 No. 1.

5 DATED: August 20, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

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By: /s/ Jon Kardassakis

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Jon Kardassakis

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Attorneys for Defendant Cedars-Sinai
Medical Center

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DECLARATION OF JON KARDASSAKIS

I, Jon Kardassakis, declare as follows:

1. I am an attorney duly admitted to practice in this Court and am a partner with Lewis Brisbois Bisgaard & Smith LLP, attorneys of record for defendant Cedars-Sinai Medical Center (“Defendant”) in this action. The facts set forth herein are of my own personal knowledge, and if sworn I could and would competently testify thereto.

2. On August 13, 2025, I and Daniel Blouin (on behalf of UNOS) met and conferred with George Laiolo, Matthew Venezia, and Daniel Contreras, attorneys for Plaintiff Anthony Randall (“Plaintiff”). During meet and confer we identified for Plaintiff’s counsel that Defendant would move to exclude the opinion testimony of Dr. Herbert Y. Lin described in the motion. The parties were not able to resolve the dispute over the subject testimony.

3. Attached as Exhibit 1 is a true and correct copy of the Expert Report of Dr. Herbert Y. Lin (Feb. 14, 2025) (Dkt. 149-58).

4. Attached as Exhibit 2 is a true and correct copy of the Rebuttal Report of Dr. Herbert Y. Lin (March 28, 2025).

5. Attached as Exhibit 3 is a true and correct copy of the Declaration of Dr. Herbert Y. Lin in Support of Plaintiff’s Reply in Support of Motion for Class Certification (March 17, 2025).

6. Attached as Exhibit 4 is a true and correct copy of the Declaration of Irene K. Kim in Support of Defendants’ Joint Opposition to Plaintiff’s Motion for Class Certification (Feb. 11, 2025).

7. Attached as Exhibit 5 is a true and correct copy of the Declaration of Irene K. Kim (March 28, 2025).

8. Attached as Exhibit 6 is a true and correct copy of the transcript of the deposition of Dr. Herbert Y. Lin (April 11, 2025) (cited excerpts).

///

1 9. Attached as Exhibit 7 is a true and correct copy of the Declaration of
2 Margaret Farrell (Apr. 22, 2025).

3 10. Attached as Exhibit 8 is a true and correct copy of Cedars' Kidney
4 Transplant Selection Policy (effective 05/29/2018) (Dkt. 104-50).

5 11. Fact discovery closed in this action on January 9, 2025. Dkt. 49.

6 I declare under penalty of perjury under the laws of the United States of
7 America that the foregoing is true and correct and that this declaration was executed
8 on this 20th day of August 2025, at Los Angeles, California.

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10 /s/ Jon Kardassakis
11 Jon Kardassakis
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CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2025, a true and correct copy of the foregoing **CEDARS-SINAI MEDICAL CENTER'S NOTICE OF MOTION AND MOTION *IN LIMINE* NO. 1 TO EXCLUDE OPINION TESTIMONY OF HERBERT Y. LIN AT TRIAL; MEMO OF POINTS AND AUTHORITIES; DECLARATION OF JON KARDASSAKIS** was filed electronically with the Clerk of the Court using the CM/ECF System. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties listed on the CM/ECF System. Parties may access this filing through the Court's electronic filing system.

DATE: August 20, 2025

By: /s/ Jon Kardassakis

Jon Kardassakis
LEWIS BRISBOIS BISGAARD & SMITH LLP
633 West 5th Street, Suite 4000
Los Angeles, California 90071
Telephone: 213.250.1800
Jon.Kardassakis@lewisbrisbois.com

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2025, a true and correct copy of the foregoing **NOTICE OF ERRATA RE CORRECTION TO CITATION IN CEDARS-SINAI'S MOTION IN LIMINE NO. 1** was filed electronically with the Clerk of the Court using the CM/ECF System. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties listed on the CM/ECF System. Parties may access this filing through the Court's electronic filing system.

DATE: September 12, 2025

By: /s/ Jon Kardassakis

Jon Kardassakis
LEWIS BRISBOIS BISGAARD & SMITH LLP
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